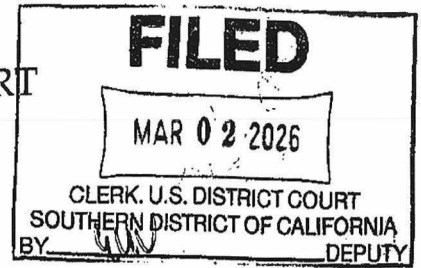


UNITED STATES DISTRICT COURT

for the
Southern District of Illinois



Mohammad Zare
Petitioner
(the name under which you were convicted)
v.
LAROSE
Respondent
(authorized person having custody of Petitioner)

Case Number: '26CV1342 CAB MMP

PETITION FOR A WRIT OF HABEAS CORPUS UNDER 28 U.S.C. § 2241

Personal Information

1. (a) Your full name: Mohammad Zare
(b) Other names you have used: _____
2. Place of confinement:
(a) Name of institution: OTAY MESA DETENTION CENTER
(b) Address: OTAY MESA Detention Center, P.O Box 439049, San Diego, CA-92143
(c) Your identification number:
3. Are you currently being held on orders by:
 Federal authorities State authorities Other - explain: _____
4. Are you currently:
 A pretrial detainee (waiting for trial on criminal charges)
 Serving a sentence (incarceration, parole, probation, etc.) after having been convicted of a crime
If you are currently serving a sentence, provide:
(a) Name and location of court that sentenced _____
(b) Docket number of criminal case: _____
(c) Date of sentencing: _____
 Being held on an immigration charge
 Other (explain): _____

Decision or Action You Are Challenging

5. What are you challenging in this petition:
 How your sentence is being carried out, calculated, or credited by prison or parole authorities (for example, revocation or calculation of good time credits)

- Pretrial detention
- Immigration detention
- Detainer
- The validity of your conviction or sentence as imposed (for example, sentence beyond the statutory maximum or improperly calculated under the sentencing guidelines)
- Disciplinary proceedings
- Other (explain): _____

6. Provide more information about the decision or action you are challenging:

(a) Name and location of the agency or court: OTAY MESA DETENTION CENTER

OTAY MESA Detention Center. P.O Box 439049. San Diego. CA-92143

(b) Docket number, case number, or opinion number: _____

(c) Decision or action you are challenging (for disciplinary proceedings, specify the penalties imposed):

I have been in continuous detention since march 25,2025.It adds up to 11 month's and there is no definite end to this detention.

My Immigration judge has been changed two times and I dont have any final hearing yet.

(d) Date of the decision or action: since march 25,2025

Your Earlier Challenges of the Decision or Action

7. **First appeal**

Did you appeal the decision, file a grievance, or seek an administrative remedy?

Yes No

(a) If "Yes," provide:

(1) Name of the authority, agency, or court: _____

(2) Date of filing: _____

(3) Docket number, case number, or opinion number: _____

(4) Result: _____

(5) Date of result: _____

(6) Issues raised: _____

(b) If you answered "No," explain why you did not I wasn't informed about or aware of this legal opportunity.

8. **Second appeal**

After the first appeal, did you file a second appeal to a higher authority, agency, or court?

Yes No

(a) If "Yes," provide:

(1) Name of the authority, agency, or court: _____

(2) Date of filing: _____

(3) Docket number, case number, or opinion number: _____

(4) Result: _____

(5) Date of result: _____

(6) Issues raised: _____

(b) If you answered "No," explain why you did not file a second appeal: N/A

9. **Third appeal**

After the second appeal, did you file a third appeal to a higher authority, agency, or court?

Yes No

(a) If "Yes," provide:

(1) Name of the authority, agency, or court: _____

(2) Date of filing: _____

(3) Docket number, case number, or opinion number: _____

(4) Result: _____

(5) Date of result: _____

(6) Issues raised: _____

(b) If you answered "No," explain why you did not file a third appeal: N/A

10. **Motion under 28 U.S.C. § 2255**

In this petition, are you challenging the validity of your conviction or sentence as imposed?

Yes No

If "Yes," answer the following:

(a) Have you already filed a motion under 28 U.S.C. § 2255 that challenged this conviction or sentence?

Yes No

If "Yes," provide:

(1) Name of court: _____

(2) Case number: _____

(3) Date of filing: _____

(4) Result: _____

(5) Date of result: _____

(6) Issues raised: _____

(b) Have you ever filed a motion in a United States Court of Appeals under 28 U.S.C. § 2244(b)(3)(A), seeking permission to file a second or successive Section 2255 motion to challenge this conviction or sentence?

Yes No

If "Yes," provide:

(1) Name of court: _____

(2) Case number: _____

(3) Date of filing: _____

(4) Result: _____

(5) Date of result: _____

(6) Issues raised: _____

(c) Explain why the remedy under 28 U.S.C. § 2255 is inadequate or ineffective to challenge your conviction or sentence: _____

11. **Appeals of immigration proceedings**

Does this case concern immigration proceedings?

Yes No

If "Yes," provide:

(a) Date you were taken into immigration custody: 03/25/2025

(b) Date of the removal or reinstatement order: N/A

(c) Did you file an appeal with the Board of Immigration Appeals?

Yes No

If "Yes," provide:

(1) Date of filing: _____

(2) Case number: _____

(3) Result: _____

(4) Date of result: _____

(5) Issues raised: _____

(d) Did you appeal the decision to the United States Court of Appeals?

Yes No

If "Yes," provide:

(1) Name of court: _____

(2) Date of filing: _____

(3) Case number: _____

(4) Result: _____

(5) Date of result: _____

(6) Issues raised: _____

12. **Other appeals**

Other than the appeals you listed above, have you filed any other petition, application, or motion about the issues raised in this petition?

Yes No

If "Yes," provide:

(a) Kind of petition, motion, or application: _____

(b) Name of the authority, agency, or court: _____

(c) Date of filing: _____

(d) Docket number, case number, or opinion number: _____

(e) Result: _____

(f) Date of result: _____

(g) Issues raised: _____

Grounds for Your Challenge in This Petition

13. State every ground (reason) that supports your claim that you are being held in violation of the Constitution, laws, or treaties of the United States. Attach additional pages if you have more than four grounds. State the facts supporting each ground.

GROUND ONE: Prolonged indehinite detention I have been in detention for approyimately 11 month's.

Besides,ther is definite end to this custody.

(a) Supporting facts (*Be brief. Do not cite cases or law.*):

I entered the U.S. on March 25,2025 . I have been in continuous detention since then.

(b) Did you present Ground One in all appeals that were available to you?

Yes No

GROUND TWO: During this detention , I lost my father it caused a lot of sadness and grief to me.

(a) Supporting facts *(Be brief. Do not cite cases or law.):*

I lost my father 3 months ago.

(b) Did you present Ground Two in all appeals that were available to you?

Yes No

GROUND THREE: I have a son back in my country , Iran who doesn't have anybody to take care of him. My son is 11 years old . I has placed much pressure on me .

(a) Supporting facts *(Be brief. Do not cite cases or law.):*

I have been detained by ICE for over 10 mounth

DHS has transferred me 2 times in this 10 mounth

ICE depriving me of my rights.

The likely duration of future detention may be longer

Being treated like a Criminal.

My final court's has changed two times

(b) Did you present Ground Three in all appeals that were available to you?

Yes No

GROUND FOUR: I'm suffering from a lot of depression and stress and I can't sleep well . I take an antidepressant

every night as well as another pill for my heart .I'm really worried about my son and feel a lot of sorrow because the loss of my Father . He died because the forces of Sepah (IRGC) raided his home in search of me .

(a) Supporting facts *(Be brief. Do not cite cases or law.):*

(b) Did you present Ground Four in all appeals that were available to you?

Yes No

14. If there are any grounds that you did not present in all appeals that were available to you, explain why you did not: N/A

Request for Relief

15. State exactly what you want the court to do:

I respectfully request this court to appoint a counsel for me . Because I am financially unable to obtain adequate representation. I am native and citizen of Iran and I have no source of income. I have been in detention for almost 11 months and I can't afford hiring a federal lawyer . Therefore it is much appreciated if this court grants me a pro bono federal lawyer so that he/she can represent me and file a petition for writ of habeas corpus .

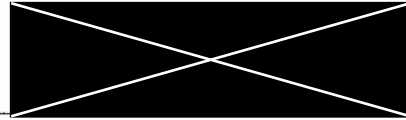
See attached .

Declaration Under Penalty Of Perjury

If you are incarcerated, on what date did you place this petition in the prison mail system:

I declare under penalty of perjury that I am the petitioner, I have read this petition or had it read to me, and the information in this petition is true and correct. I understand that a false statement of a material fact may serve as the basis for prosecution for perjury.

Date: Feb. 20. 2026



Signature of Petitioner

Signature of Attorney or other authorized person, if any